

Document Log Item

Addressing	
From	To
Carmen Santos/R9/USEPA/US	Linda.Conlan@amec.com Linda.Conlan@amec.com
CC	BCC
Patrick Wilson/R9/USEPA/US@EPA	Steve Armann/R9/USEPA/US@EPA
Description Form Used: Memo	
Subject	Date/Time
PCBs: Pechiney - 2nd Set of Questions	01/27/2010 11:43 AM
# of Attachments	Total Bytes
1	105,507
NPM	
Contributor	
Processing	
Comments	

Body

Document Body

Greetings, Linda:

Thank you for setting up a conference call number for our call on Friday January 29, 2010
Below is the second set of questions that I have on the Pechiney Application.

1. What is the justification for the number of soil samples to be collected beneath PCB-impacted concrete and sampling grid used to arrive to the number of samples? What is the rationale for the number of samples proposed in the table included in Section 61.1.3?
2. What is the justification for the number of bulk concrete samples proposed to determine the concentration of PCBs in concrete that will be crushed for disposal on site? What is the rationale for the sampling grid that will be used for collection of these concrete samples?

Recently, USEPA provided to AMEC Geomatrix the SOP for sampling porous surfaces (such as concrete)

3. The Application indicates that areas of concrete assumed not to be associated with former PCB related activities are assumed to have PCB concentrations below the risk based soil levels calculated in the Application and that such concrete can be crushed and used on site as fill. Preliminarily, we do not agree with this assumption and request that use of crushed concrete at the site be supported by PCB analysis of a reasonable and representative number of concrete samples collected from concrete not yet tested for PCBs.

4. Except for Building 114, USEPA has not been involved with sampling, investigatory, and removal activities conducted to date at the Pechiney site. Does the Pechiney facility encompass Building 114?

5. What is the PCB concentration of soils deeper than 15 feet at the Pechiney site? What are the plans for these soils if PCBs are present?

6. In Section 5.2 of the Application the following PCB remediation goals are proposed: 5.3 mg/kg PCBs for soils to be left exposed at the surface (upper 5 feet), a 35 mg/kg PCBs for soils that will be 5 feet below crushed concrete that contains PCBs below 5.3 mg/kg, and a 5.3 mg/kg PCBs for concrete that may be demolished, crushed, and disposed onsite as fill. However, Section 5.6.1 (Demolition and Disposal of PCB-impacted Concrete) of the Application states that "PCB-impacted concrete slab areas where concentrations exceed the proposed site-specific remediation goal of 5.3 mg/kg and 50 mg/kg will be demarcated in the field by marking the slab surface." Section 5.2 of the Application does not refer to a 50 mg/kg remediation goal. Please reconcile this apparent inconsistency.

7. Section 6.1.2 (Surface./Shallow PCB Impacted Soil Remedial Action Implementation) states that "[t]his remedy will be implemented after below-grade demolition of surface slabs and pavements, utilities and pipelines, pits, sumps, and other deeper structures is complete." Please explain which section of the Application responds to the issues raised by USEPA in Items 4 through 7 of its October 6, 2006 letter disapproving Geomatrix's September 27, 2006 self implementing PCB cleanup notification. For example, Item 6 in the attached USEPA letter makes reference to galbestos and potential PCB contamination in soil due to potential deterioration of galbestos. Attached is the electronic file (pdf) containing a copy of USEPA's letter.



10_06_2010_Pechiney_76161aNotification_Disapprov_PDF_B'w'_1S2018.pdf

8. Please explain what measures will be taken onsite to prevent worker and public exposure to dust that may be potentially generated during crushing of PCB-contaminated concrete planned for use onsite.

9. If available, please provide detailed information on the redevelopment plans for the facility. We want to have a clearer understanding of all the land use projects the City of Vernon has approved for the Pechiney site and potential exposure pathways upon redevelopment of the facility.

10. In what manner are the exposure scenarios used in Sections 4.0 to 6.0 of the Application consistent with or more protective than the exposure scenarios assumed for high and low occupancy areas as those areas are defined under Section 761.3 of the TSCA regulations.

I may have additional questions later.

Thank you for your courtesies. I look forward to our conference call on Friday January 29, 2010 at 10:30 AM.

Sincerely,

Carmen D. Santos, Project Manager
RCRA Corrective Action Office
Waste Management Division
USEPA Region 9
415.972.3360
fax: 415.947.3533